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May 25, 2018

Job No. 3-418-0250

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Subject: PHASE I ENVIRONMENTAL SITE ASSESSMENT
Proposed Shell Gas Station and Retail
NWC Nason Street and Fir Avenue
Moreno Valley, CA

Dear Mr. Etemadian:

At your request and authorization, SALEM Engineering Group, Inc. (SALEM) has conducted this Phase I Environmental Site Assessment (ESA) for the proposed Shell Gas Station and Retail site located on the northwest corner of the intersection of Nason Street and Fir Avenue in Moreno Valley, California (subject property). During the course of this assessment, SALEM identified no evidence of a Recognized Environmental Condition (REC) in connection with the subject property as defined by ASTM E1527-13. However, the following site development issue was identified:

- A septic system associated with the residence was identified on the subject property during SALEM's May 23, 2018 site reconnaissance. The presence of a septic system is not anticipated to adversely impact the subject property due to its use for domestic purposes only. If redevelopment of the subject property is to occur, the septic system should be properly abandoned/closed or destroyed in accordance with State and local guidelines.

We appreciate the opportunity to assist you with this project. If you have any questions, or if we may be of further assistance, please do not hesitate to contact our office at (909) 980-6455.

Respectfully submitted,

SALEM Engineering Group, Inc.

A handwritten signature in blue ink, appearing to read 'Joe Grippaldi', is written over a light blue horizontal line.

Joe Grippaldi
Environmental Project Manager



SALEM

engineering group, inc.

PHASE I ENVIRONMENTAL SITE ASSESSMENT

PROPOSED SHELL GAS STATION AND RETAIL
NWC NASON STREET AND FIR AVENUE
MORENO VALLEY, CALIFORNIA

SALEM PROJECT NO. 3-418-0250
MAY 25, 2018

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TABLE OF CONTENTS

Job No. 3-418-0250

1.0	EXECUTIVE SUMMARY	1
2.0	PURPOSE AND SCOPE OF ASSESSMENT	1
2.1	Purpose.....	1
2.2	Scope of Work	2
3.0	SITE DESCRIPTION.....	3
4.0	PHYSIOGRAPHY AND HYDROGEOLOGIC CONDITIONS.....	3
5.0	SITE RECONNAISSANCE.....	4
5.1	Observations	4
5.2	Adjacent Streets and Property Usage.....	5
5.3	Potable Water Source.....	5
5.4	Sewage Disposal System	5
5.5	Heating and Cooling Source	6
6.0	USER-PROVIDED INFORMATION.....	6
6.1	Preliminary Title Report	6
6.2	Phase I Environmental Site Assessment User Questionnaire	6
7.0	SITE USAGE SURVEY	7
7.1	Phase I Environmental Site Assessment Owner Questionnaire & Interview.....	7
7.2	Historical Aerial Photograph Review	7
7.3	Building Department Records Review	9
7.4	City Directories	9
7.5	Sanborn Fire Insurance Maps	9
7.6	Agricultural Chemicals	9
7.7	Phase I Environmental Site Assessment Interview - Previous Owner.....	10
7.8	Previous Environmental Reports	10
8.0	REGULATORY AGENCY RECORDS REVIEW	10
8.1	Standard Environmental Record Sources	11
9.0	POTENTIAL VAPOR ENCROACHMENT CONDITION	15
9.1	Vapor Encroachment Screening	15
10.0	BUSINESS ENVIRONMENTAL RISKS.....	16
10.1	Asbestos-Containing Building Materials	16
10.2	Lead-Based Paint	17
10.3	Radon.....	17
10.4	Mold.....	17
11.0	DISCUSSION OF FINDINGS	18
11.1	Evaluation of Data Gaps/Data Failure	19
12.0	SUMMARY AND CONCLUSIONS	19
13.0	LIMITATIONS.....	19
14.0	QUALIFICATIONS	20
15.0	REFERENCES.....	21

TABLE OF CONTENTS (cont'd)

Job No. 3-418-0250

PHOTOGRAPHS

Following the Text of the Report

FIGURES

Topographic Map..... 1
Aerial Photograph..... 2
Site Map..... 3

APPENDICES

Preliminary Title Reports..... A
Phase I ESA All Appropriate Inquiry (AAI) User Questionnaires..... B
Phase I ESA All Appropriate Inquiry (AAI) Owner Questionnaire..... C
Aerial Photographs..... D
Building Department Records..... E
City Directory Image Report..... F
Sanborn Fire Insurance Map No Coverage Certification..... G
EDR Radius Map Report..... H
Professional Resumes..... I

May 25, 2018

Job No. 3-418-0250

PHASE I ENVIRONMENTAL SITE ASSESSMENT**PROPOSED SHELL GAS STATION AND RETAIL
NWC NASON STREET AND FIR AVENUE
MORENO VALLEY, CALIFORNIA****1.0 EXECUTIVE SUMMARY**

SALEM Engineering Group, Inc. (SALEM) has conducted a Phase I Environmental Site Assessment (ESA) of the proposed Shell Gas Station and Retail site located on the northwest corner of the intersection of Nason Street and Fir Avenue in Moreno Valley, California (subject property). The subject property comprises three contiguous irregular-shaped parcels totaling approximately 5.7 acres (Riverside County Assessor's Parcel Numbers [APNs] 487-250-010-9 and 487-250-007 and Department of Transportation Number DD#9241-0A-01). SALEM conducted this Phase I ESA of the subject property in conformance with the American Society for Testing and Materials (ASTM) E1527-13 *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*. The U.S. Environmental Protection Agency (USEPA) has determined that the ASTM E1527-13 Standard is consistent with the requirements for conducting an "All Appropriate Inquiry" under 40 C.F.R. Part 312. Thus, this Phase I ESA constitutes All Appropriate Inquiry (AAI) designed to identify Recognized Environmental Conditions (RECs) in connection with the previous ownership and uses of the subject property as defined by ASTM E1527-13 and 40 C.F.R. Part 312.

ASTM E1527-13 Section 1.1.1 *Recognized Environmental Conditions* – The term *recognized environmental conditions* is defined as "the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment." The term as further defined by ASTM "is not intended to include de minimis conditions that generally do not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies." Conditions determined to be *de minimis* are not *recognized environmental conditions*.

SALEM identified no evidence of a REC in connection with the subject property as defined by ASTM E1527-13. However, the following site development issue was identified:

- A septic system associated with the residence was identified on the subject property during SALEM's May 23, 2018 site reconnaissance. The presence of a septic system is not anticipated to adversely impact the subject property due to its use for domestic purposes only. If redevelopment of the subject property is to occur, the septic system should be properly abandoned/closed or destroyed in accordance with State and local guidelines.

2.0 PURPOSE AND SCOPE OF ASSESSMENT**2.1 Purpose**

According to ASTM E1527-13, the purpose of this practice is to define good commercial and customary practice in the United States of America for conducting an *environmental site assessment* of a parcel of *commercial real estate* with respect to the range of contaminants within the scope of the Comprehensive

Environmental Response, Compensation and Liability Act (CERCLA) (42 U.S.C. §9601) and *petroleum products*. As such, this practice is intended to permit a *user* to satisfy one of the requirements to qualify for the *innocent landowner, contiguous property owner, or bona fide prospective purchaser* limitations on CERCLA liability (hereinafter, the “*landowner liability protections,*” or “*LLPs*”): that is, the practice that constitutes “*all appropriate inquiry* into the previous ownership and uses of the *property* consistent with good commercial or customary practice” as defined at 42 U.S.C. §9601(35) (B).

The Phase I ESA was conducted to identify ‘Recognized Environmental Conditions’ (RECs), ‘Controlled Recognized Environmental Conditions’ (CRECs) and ‘Historical RECs’(HRECs) as defined by the American Society for Testing and Materials (ASTM) *Designation E1527-13 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*. Section 1.1.1 of the ASTM *Designation E1527-13* defines an REC as “the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.” The term as further defined by ASTM “is not intended to include de minimis conditions that generally do not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.” Section 3.2.18 defines a CREC as a “recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).” Section 3.2.42 defines HREC as a “past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (for example, property use restrictions, activity and land use limitations, institutional controls, or engineering controls).”

2.2 Scope of Work

The objective of the SALEM Phase I ESA scope of work is to provide an evaluation of RECs at the subject property and potential off-site sources. The scope of work for this Phase I ESA conforms to ASTM E1527-13. SALEM was provided verbal authorization to conduct the Phase I ESA by Mr. Oscar Etemadian with Fuel Xpress, Inc. on March 15, 2018, in accordance SALEM’s proposal P3-418-0396r. In fulfillment of the SALEM scope of work for this Phase I ESA, SALEM was retained to perform the following tasks:

- Acquire readily available information regarding land-use history and property development by reviewing historical aerial photographs, pertinent building permit records, historic city directories, as well as reviewing recent and historic topographic land-use maps of the subject property and surrounding area.
- A reasonable attempt at conducting interviews with state and/or local government relevant officials in the form of either an in-person interview, by telephone, or in writing via a formal records request at the discretion of the environmental professional, in an effort to obtain information indicating RECs in connection with the subject property.
- Reviewing readily available local, state and federal regulatory agency databases listed in ASTM E1527-13 and compiled by Environmental Data Resources, Inc. (EDR), including but not limited to CERCLA and NPL lists for sites within one mile of the subject property. State databases, including but not limited to CALSITES, Hazardous Substance Account Act, Cortese, SWIS,

SWAT, Well Investigation Program (AB1803), and LUFT, were reviewed for sites within one mile of the subject property.

- Performing a reconnaissance of the subject property and surrounding areas (up to one-half mile beyond site boundary), with regard to potential off-site sources of RECs to the subject property, which included photograph documentation of subject property conditions, and identification of potential RECs, such as aboveground storage tanks and/or indications of underground storage tanks on-site, and interviews with persons knowledgeable of the previous and current ownership and uses of the subject property.
- In addition to ASTM E1527-13, SALEM recognizes ASTM *Standard Guide for Vapor Encroachment Screening (VES) on Property Involved in Real Estate Transactions* (ASTM E2600-15) as an industry-accepted guideline to determine if a Vapor Encroachment Condition (VEC) exists at the target property. A VES consists of reviewing the Phase I ESA data combined with the application of professional judgment. SALEM evaluates the regulatory agency databases to determine if there are known or suspect contaminated sites within a minimum search distance of the target property. In addition, SALEM attempted to determine whether soil and/or groundwater have been impacted within the critical distances outlined in ASTM E2600-15.
- Preparing this report of SALEM's findings and recommendations if warranted.

3.0 SITE DESCRIPTION

The subject property comprises three contiguous irregular-shaped parcels totaling approximately 5.7 acres (Riverside County APNs 487-250-010-9 and 487-250-007 and DD#9241-0A-01) located on the northwest corner of the intersection of Nason Street and Fir Avenue in Moreno Valley, California. At the time of SALEM's May 23, 2018 site reconnaissance, the western portion of the subject property was developed with a single-family dwelling and two commercial cell phone towers. The eastern portion of the subject property was partially graded land covered in native vegetation and developed with a stormwater basin. The subject property is located in Section 4, Township 3 South, Range 3 West, San Bernardino Baseline and Meridian, United States Geological Survey (U.S.G.S.) 7.5 Minute Topographic Map, Sunnymead, California Quadrangle dated 2012.

4.0 PHYSIOGRAPHY AND HYDROGEOLOGIC CONDITIONS

The subject property is located within the Peninsular Range Geomorphic Province, an area characterized by active northeast trending strike slip faults, including the San Jacinto to the northwest, and the Elsinore to the southwest. The project site is situated between the Santa Rosa Mountains and the San Jacinto Mountains to the east; and Santa Ana Mountains to the west and south. The near-surface deposits in the vicinity of the subject site are comprised of recent alluvium consisting of unconsolidated sands, silt, and clays derived from erosion of local mountain ranges.

According to California Regional Water Quality Control Board (RWQCB) records for the Thrifty #353 (Former Challenge #83) Leaking Underground Storage Tank (LUST) site located at 24991 Sunnymead Boulevard (approximately 1.9 miles west of the subject property), groundwater is reported to be first encountered at a depth of approximately 91 feet below ground surface (bgs) with a general direction of flow to the south-southeast. However, local groundwater level and flow direction may vary due to seasonal fluctuations in precipitation, usage demands, geology, and/or surface topography.

5.0 SITE RECONNAISSANCE

A site reconnaissance, which included a visual observation of the subject property and properties within the subject area, was conducted by SALEM's environmental assessor on May 23, 2018. The objective of the site reconnaissance is to identify RECs, including the storage and handling of hazardous substances and petroleum products on or in the vicinity of the subject property which have the potential to environmentally impact on-site soils, surface water and groundwater.

5.1 Observations

Table I summarizes the visual observations made during our site reconnaissance. A discussion of the physical observations follows Table I. Refer to the Site Map (Figure 1) and color photographs following the text for the locations of the features discussed in this section of the report.

TABLE I
Summary of Observations during Site Reconnaissance

FEATURE	OBSERVED	NOT OBSERVED
Structures (existing)	X	
Evidence of past uses	X	
Hazardous substances and/or petroleum products (including containers)		X
Aboveground storage tanks (ASTs)	X	
Underground storage tanks (USTs) or evidence of USTs		X
Strong, pungent, or noxious odors		X
Pools of liquid likely to be hazardous materials or petroleum products		X
Drums	X	
Unidentified substance containers		X
Pad-mounted/Pole-mounted transformers/capacitors/other PCB-containing equipment		X
Subsurface hydraulic equipment		X
Heating/ventilation/air conditioning (HVAC)		X
Stains or corrosion on floors, walls, or ceilings		X
Floor drains and sumps		X
Pits, ponds, or lagoons		X
Stained soil and/or pavement		X
Stressed vegetation		X
Waste or wastewater discharges to surface or surface waters on subject property (including stormwater)		X
Wells (irrigation, domestic, dry, injection, abandoned, monitoring wells)		X
Septic Systems	X	

The subject property comprises three contiguous irregular-shaped parcels totaling approximately 5.7 acres (Riverside County APNs 487-250-010-9 and 487-250-007 and DD 9241-0A-01) located on the northwest corner of the intersection of Nason Street and Fir Avenue in Moreno Valley, California. At the time of SALEM's site reconnaissance, the western portion of the subject property was developed with a single-family dwelling and two commercial cell phone towers. The address associated with the residence is 26930 Fir Avenue. The residence was of wood-framed construction on a concrete slab-on-grade foundation and a pitched clay tile roof. The residence was occupied at the time of the site reconnaissance. Additionally, multiple stables were observed on the western portion of the subject property for horses that were formerly kept at the property. The eastern portion of the subject property was partially graded land covered in native vegetation and developed with a stormwater basin.

- The northwestern portion of the subject property was developed with two commercial cell phone towers and associated electrical utilities. A backup generator with a 52-gallon diesel sub-tank associated with the northern-most cell phone tower was observed. The diesel sub-tank appeared in good condition and no signs of staining or discoloration were observed.

- A septic tank was identified to the north of the residential structure on the western portion of the subject property. No signs of staining or discoloration were observed around the septic tank vicinity.
- Six 55-gallon drums were observed on the western portion of the subject property. The drums were filled with water and reportedly used for storing drinking water for horses, which were formerly boarded on the western portion of the subject property.
- Hazardous materials observed to be stored and handled on the western portion of the subject property included minor quantities of oils, paints, cleaning chemicals and lubricants. Several metal containers of propane were observed in a shed area. No staining in the vicinity of the storage areas was observed. No floor drains were observed in the vicinity of the storage areas.
- The eastern portion of the subject property appeared to be utilized as a stormwater basin. A concrete v-ditch traversed the majority of the subject property. The v-ditch on the southern portion of the subject property flowed towards a patch of gravel and vegetation while the v-ditch on the northern portion flowed to a culvert to the north of the subject property. An inlet culvert was also observed on the eastern portion of the subject property, connecting to the southern portion of the v-ditch. No signs of staining or discoloration were observed in or around the v-ditch or near the culvert.
- Exposed surface soils did not exhibit obvious signs of discoloration. No other obvious evidence (vent pipes, fill pipes, dispensers, etc.) of USTs was noted within the area observed. No standing water or major depressions were observed on the subject property.

5.2 Adjacent Streets and Property Usage

Table II summarizes the adjacent streets and properties uses observed during the SALEM's site reconnaissance.

TABLE II
Adjacent Streets and Property Use

DIRECTION	ADJACENT STREET	ADJACENT PROPERTY USE
North	None	Vacant Land
East	Nason Street	Jack-In-The-Box (27030 Fir Avenue); U.S. Bank (27020 Fir Avenue); Taco Bell (27010 Fir Avenue); Parking Lot
South	Fir Avenue	Single-Family Residential
West	None	Vacant Land

Based on the observed uses of the properties located immediately adjacent to the subject property, it is unlikely that significant quantities of hazardous materials are stored or handled at the adjacent properties.

5.3 Potable Water Source

The water purveyor for the subject properties vicinity is the Eastern Municipal Water District (EMWD). The EMWD's water quality monitoring is an on-going program with water samples obtained on a regular basis. It is the responsibility of the EMWD to provide customers with potable water in compliance with the California Maximum Contaminant Levels (MCLs) for primary drinking water constituents in water supplied to the public. Water sampling was not conducted to verify water quality.

5.4 Sewage Disposal System

On May 14, 2018, the EMWD was contacted regarding sewer service for the subject property. According to a representative of EMWD, no records of sewer service are available for the subject property APNs or the associated subject property address. A septic system was identified on the subject property during SALEM's May 23, 2018 site reconnaissance. The presence of a septic system is not anticipated to adversely

impact the subject property due to its use for domestic purposes only. If redevelopment of the subject property is to occur, the septic system should be properly abandoned/closed or destroyed in accordance with State and local guidelines.

5.5 Heating and Cooling Source

Heating and cooling systems as well as domestic hot water equipment are fueled by electricity provided by Moreno Valley Utility (MVU). The mechanical system is comprised of a split system with a central unit and interior air-handler and an exterior condenser. Hot water is provided by electric water heating units. No documentation of fuel oil use was identified during review of reasonably ascertainable records and no visual evidence of fuel oil use was identified during the site reconnaissance. Therefore, it is unlikely for a former fuel oil UST to have been used at the subject property and for a release to have occurred. However, based upon SALEM's experience, contamination which could be associated with a release would likely present a de minimis condition. If a fuel oil UST is discovered in the future and/or evidence of a release of historical fuel oil is identified, further evaluation may be necessary.

6.0 USER-PROVIDED INFORMATION

A review of a user-provided Commitment for Title Insurance report and a Phase I ESA User Questionnaire was conducted in order to help identify pertinent information regarding potential environmental impacts associated with the subject property.

6.1 Preliminary Title Report

SALEM received three Preliminary Title Reports for the subject property. Preliminary Title Reports by Chicago Title Company, dated September 6, 2017; Fidelity National Title Company, dated February 20, 2018; and Lawyers Title Company, dated May 23, 2014 were provided to SALEM by Mr. Oscar Etemadian with Fuel Xpress, Inc. The Preliminary Title Reports were reviewed to identify potential deed restrictions, environmental liens or activity and use limitations (AULs) which may have occurred on or exist in connection with the subject property as indicated by the Preliminary Title Reports. SALEM's review of the Preliminary Title Reports indicated no deed restrictions, environmental liens or AULs for the subject property. However, as quoted from the Preliminary Title Reports, "it is important to note that this document is not a written representation as to the condition of title and may not list all liens, defects and encumbrances affecting title to the land." Therefore, SALEM recommends that at the close of the real estate transaction and upon the issuance of the Final Title Report that the Final Title Report be reviewed and any information deviating from that presented in the Preliminary Title Reports reviewed herein revealing evidence of RECs. Refer to Appendix A for copies of the Preliminary Title Reports.

6.2 Phase I Environmental Site Assessment User Questionnaire

Two completed Phase I ESA User Questionnaires were received from Mr. Oscar Etemadian with Fuel Xpress, Inc. dated March 15 and May 16, 2018. Please refer to Appendix B for copies of the completed Phase I ESA User Questionnaires.

In order to qualify for one of the *Landowner Liability Protections (LLPs)* offered by the Small Business Liability Relief and Brownfields Revitalization Act of 2001 (the "*Brownfields Amendments*"), the *user* must provide the following information (if available) to the *environmental professional*. Failure to provide this information could result in a determination that "*all appropriate inquiry*" is not complete. The user is asked to provide information or knowledge of the following:

- Environmental cleanup liens that are filed or recorded against the site.
- Activity and land use limitations that are in place on the site or that have been filed or recorded in a registry.

-
- Specialized knowledge or experience of the person seeking to qualify for the LLPs.
 - Relationship of the purchase price to the fair market value of the *property* if it were not contaminated.
 - Commonly known or *reasonably ascertainable* information about the *property*.
 - The degree of obviousness of the presence or likely presence of contamination at the *property*, and the ability to detect the contamination by appropriate investigation.

According to Mr. Etemadian, to the best of his knowledge as the user of this Phase I ESA, no environmental cleanup liens and no activity or land use limitations have been filed or recorded against the subject property. Mr. Etemadian indicated that he did not have knowledge of the past or current spills or chemical releases or environmental cleanups at the subject property. Additionally, Mr. Etemadian indicated that the purchase price of the subject property reasonably reflects fair market value.

7.0 SITE USAGE SURVEY

In order to assess the subject property's history, SALEM reviewed a Phase I ESA Owner Questionnaire, historical aerial photographs, building department records, city directories, planning department records and SFIMs.

7.1 Phase I Environmental Site Assessment Owner Questionnaire and Interview

As of the date of issuance of this report, a completed Phase I ESA Owner Questionnaire for the unoccupied portion of the subject property had not been provided to SALEM. The Phase I ESA Owner Questionnaire is designed to provide pertinent information regarding potential environmental and historical impacts associated with the subject property. Upon receipt of a completed Phase I ESA Owner Questionnaire, and if the Phase I ESA Owner Questionnaire responses alter the conclusions and recommendations of the Phase I ESA, SALEM will issue an addendum to this report summarizing the Phase I ESA Owner Questionnaire responses. Please refer to Appendix C for a copy of the Phase I ESA Owner Questionnaire.

On May 23, 2018, a Phase I ESA verbal interview was conducted with Mr. Bill Redden, the current owner of the subject property. The interview questions were based on the Phase I ESA Owner Questionnaire. Mr. Redden reported that he had been familiar with the subject property for approximately 40 years and that the subject property is currently developed with a single-family dwelling and two commercial cell phone towers. Mr. Redden indicated that a septic tank is present on the subject property.

According to Mr. Redden, to the best of his knowledge, no on-site treatment or discharge of waste; no on-site leach fields, dry wells, sumps, or disposal ponds; no use, storage or disposal of hazardous materials; no existing or former USTs or ASTs; no hazardous material spills; no buried materials; no domestic or irrigation wells; or any additional items of environmental concern were associated with the subject property.

7.2 Historical Aerial Photograph Review

Historical aerial photographs of the subject property and vicinity dated 1938, 1949, 1953, 1967, 1978, 1985, 1989, 1997, 2002, 2006, 2010 and 2014 were reviewed to evaluate changes in land-use for the subject property. The historical aerial photographs were supplied by EDR. Refer to Appendix D for a copy of the EDR-provided aerial photographs. A summary of the aerial photographs is provided below:

➤ 1938 Aerial Photograph

The northern and western portions of the subject property are utilized for agricultural purposes. The southeastern portion of the subject property is undeveloped. A dry stream channel traverses the southeastern portion of the subject property. The adjoining properties to the north and south are undeveloped. A paved two-lane road (Nason Street) adjoins the subject property to the east, beyond

which is undeveloped land. Agricultural development adjoins the subject property to the west. A paved two-lane road (Route 60) is observed to the north.

➤ **1949 Aerial Photograph**

The conditions on the subject property and adjoining properties to the north, south and west are similar to the 1938 aerial photograph. Agricultural development adjoins the subject property to the east beyond Nason Street.

➤ **1953 Aerial Photographs**

The conditions on the subject property and adjoining properties are similar to the 1949 aerial photograph.

➤ **1967 Aerial Photograph**

The northern portion of the subject property is developed with a paved two-lane road connecting to Nason Street and traversing northwest. Agricultural use is no longer observed on the subject property. An increase in agricultural use is observed on the adjoining properties to the east and southeast beyond Nason Street. A paved two-lane road (Fir Avenue) adjoins the subject property to the south, beyond which is undeveloped. Agricultural development is no longer observed adjoining to the west of the subject property. Route 60 has been expanded into a four-lane highway.

➤ **1978 Aerial Photograph**

The conditions on the subject property and adjoining properties are similar to the 1967 aerial photograph.

➤ **1985 Aerial Photograph**

The southwest portion of the subject property is developed with the current single-family dwelling. The conditions on the adjoining properties are similar to the 1978 aerial photograph.

➤ **1989 Aerial Photograph**

The conditions on the subject property and adjoining properties are similar to the 1985 aerial photograph.

➤ **1997 Aerial Photograph**

The western portion of the subject property is developed with a small corral and multiple shed-like structures to north of the single-family dwelling. The conditions on the adjoining properties to the north and south are similar to the 1989 aerial photograph. Agricultural use is no longer observed adjoining to the east of the subject property beyond Nason Street.

➤ **2002 Aerial Photograph**

The conditions on the subject property and adjoining properties are similar to the 1997 aerial photograph.

➤ **2006 Aerial Photograph**

The conditions on the subject property and adjoining properties are similar to the 2002 aerial photograph, with the exception of a new shed-like structure observed on the northwest portion of the subject property. The adjoining property to the east beyond Nason Street appears to have been graded. Route 60 has been expanded into a six-lane highway.

➤ **2010 Aerial Photograph**

The conditions on the subject property and adjoining properties to the north, south and west are similar to the 2006 aerial photograph. Commercial development with paved parking areas adjoin the subject property to the east beyond Nason Street. Nason Street and Fir Avenue have been expanded into four-lane roads.

➤ **2014 Aerial Photograph**

The eastern portion of the subject property appears to have been partially graded. The paved two-lane road is no longer observed on the northern portion of the subject property. The dry stream channel on the southeastern portion of the subject property appears to have been rerouted into a stormwater channel, traversing south to north across the eastern portion of the subject property. The conditions on the adjoining properties are similar to the 2010 aerial photograph.

7.3 Building Department Records Review

On April 2, 2018, the City of Moreno Valley Building and Safety Division (MVBSD) was contacted for the subject property APNs 487-250-010-9 and 487-250-007 and the associated subject property address of 26930 Fir Avenue. According to MVBSD records, the earliest building permit on file for the subject property address was a building permit for a “Bonus Room and Work Shop” inside an existing garage dated May 6, 1991. A permit for the installation of a “Backyard Water System” dated November 22, 1993, was on file. A permit for the installation of an “Emergency Standby Generator and Aboveground Diesel Sub-tank” dated July 18, 2003 was on file. Additional permits were on file for the subject property, including electrical permits and permits for the installation and maintenance of two commercial cell phone towers at the subject property. No building permits for items of environmental concern including USTs, septic systems, demolition or previous structures were on file for the subject property. Please refer to Appendix E for copies of pertinent MVBSD records.

7.4 City Directories

On May 17, 2018, SALEM contracted with EDR to provide a City Directory Image Report dated 1975 through 2014 for the subject property address of 26930 Fir Avenue, as well as the subject property vicinity. The subject property address was listed in the EDR-provided City Directory Abstract as being occupied by William D Redden (1992-2005 and 2014) and Ben C. Redden (2010). Please refer to Appendix F for a copy of the EDR-provided City Directory Image Report.

7.5 Sanborn Fire Insurance Maps

SALEM reviews SFIMs to evaluate prior land use at the subject property and adjacent properties. SFIMs typically exist for cities with populations of 2,000 or more, the coverage dependent on the location of the property. On May 15, 2018, SALEM contracted with EDR to provide a Fire Insurance Map Abstract indicating the availability of historic SFIMs for the subject property and adjacent properties as far back as 1867. EDR’s search of collections at the Library of Congress, University Publications of America, and various public and local sources revealed no coverage for the subject property and adjacent properties. Refer to Appendix G for a copy of the EDR SFIM No Coverage Certification.

7.6 Agricultural Chemicals

Review of historical aerial photographs indicates the subject property has not been utilized for agricultural purposes since at least 1967. Based upon the length of time since the subject property was last used for agricultural purposes, it is not anticipated that elevated concentrations of environmentally persistent pesticides would be found in the near-surface soils of the subject property. SALEM’s sampling and analysis of surface soils from properties with similar histories has typically yielded non-detectable concentrations of environmentally persistent pesticides. It is not anticipated that elevated concentrations of environmentally persistent pesticides would be found in the near-surface soils of the subject property and therefore, the former agricultural use of the subject property does not present an REC to the subject property.

7.7 Phase I Environmental Site Assessment Interview - Previous Owner

SALEM attempted to interview the previous owner of the subject property to provide pertinent information regarding potential environmental and historical impacts associated with the subject property. However, a Phase I ESA interview with the previous owner of the subject property was not reasonable ascertainable.

7.8 Previous Environmental Reports

SALEM was not provided with additional environmental reports for the subject property.

8.0 REGULATORY AGENCY RECORDS REVIEW

SALEM conducted a review of regulatory agency records for the purpose of determining if hazardous materials/hazardous wastes have been stored or handled on the subject property and area properties of environmental concern. The most current records available were reviewed.

California Environmental Protection Agency, Department of Toxic Substances Control

SALEM's May 16, 2018 review of the California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) Envirostor California cleanup sites database available via the DTSC Internet Website which tracks federal superfund sites, state response sites, voluntary cleanup sites, and school cleanup sites, indicated that no records of cleanup sites are on file with the DTSC for the subject property.

California Regional Water Quality Control Board

SALEM's May 16, 2018 review of the RWQCB Geotracker leaking underground fuel tank (LUFT) database available via the RWQCB Internet Website indicated no records of LUFTs are on file with the RWQCB for the subject property or adjoining properties.

California Division of Oil, Gas, and Geothermal Resources

SALEM reviewed the California Division of Oil, Gas, and Geothermal Resources (DOGGR) website (<http://maps.conservation.ca.gov/doggr/#close>) to evaluate the potential for existing/former oil, gas, or geothermal wells on the subject property or adjoining properties. The subject property is located within DOGGR Southern District. The subject property vicinity is not located within an oil, gas, or geothermal field. The review of DOGGR information does not indicate that an oil, gas, or geothermal well has been drilled on the subject or adjacent properties.

Riverside County Department of Environmental Health

On May 16, 2018, the Riverside County Department of Environmental Health (RCDEH) was contacted regarding records of registered USTs, historical hazardous/flammable permits, hazardous materials handling, and unauthorized releases of hazardous materials for the subject property. According to a representative of the RCDEH, no records of registered USTs, historical hazardous/flammable permits, hazardous materials handling, or unauthorized releases of hazardous materials were on file for the subject property.

Riverside County Fire Department

On March 26, 2018, the Riverside County Fire Department (RCFD) was contacted regarding records of registered USTs, historical hazardous/flammable permits, hazardous materials handling, and unauthorized releases of hazardous materials for the subject property. According to a representative of the RCFD, no records of registered USTs, historical hazardous/flammable permits, hazardous materials handling, or unauthorized releases of hazardous materials were on file for the subject property.

Local Area Tribal Records

According to the EDR Radius Map Report, no tribal records are listed for the subject property or the adjacent properties.

8.1 Standard Environmental Record Sources

EDR performed a search of Federal, State and local regulatory agency databases for the subject property and surrounding area. The various search distances as required by ASTM E1527-13 extended up to one mile from the subject property. Several agencies have published documents that list businesses or properties which have handled hazardous materials or hazardous waste, or may have had a documented release of hazardous materials or petroleum products. The databases consulted in the course of this assessment were compiled by EDR on May 15, 2018 and represent reasonably ascertainable current listings. SALEM did not verify the locations and distances of every site listed by EDR. SALEM verified locations and distances of the sites SALEM deemed as having a potential to environmentally impact the subject property. The actual location of the off-site properties identified may differ from the EDR listing. Table III summarizes the listed properties located within the specified ASTM Search Radii. The EDR Radius Map report is included in Appendix H.

TABLE III
EDR Radius Map Summary

DATABASE	TYPE OF RECORDS	SUBJECT PROPERTY	<1/8 MILE	1/8 - 1/4 MILE	1/4 - 1/2 MILE	1/2 - 1 MILE
STANDARD ENVIRONMENTAL RECORDS						
<i>Federal NPL Site List</i>						
NPL	National Priorities List	0	0	0	0	0
Proposed NPL	Proposed National Priorities List	0	0	0	0	0
NPL LIENS	Federal Superfund Liens	---	---	---	---	---
<i>Federal Delisted NPL Site List</i>						
Delisted NPL	National Priority List Deletions	0	0	0	0	0
<i>Federal CERCLIS List</i>						
SEMS	Superfund Enterprise Management System	0	0	0	0	---
Federal Facility	Federal Facility	0	0	0	0	---
<i>Federal CERCLIS NFRAP Site List</i>						
SEMS-ARCHIVE	Superfund Enterprise Management System Archive	0	0	0	0	---
<i>Federal RCRA CORRACTS Facilities List</i>						
CORRACTS	Corrective Action Report	0	0	0	0	0
<i>Federal RCRA non-CORRACTS TSD Facilities List</i>						
RCRA-TSDF	Transporters, Storage, and Disposal	0	0	0	0	---
<i>Federal RCRA Generators List</i>						
RCRA - LQG	RCRA - Large Quantity Generators	0	0	2	---	---
RCRA - SQG	RCRA - Small Quantity Generators	0	0	0	---	---
RCRA - CESQG	Conditionally Exempt SQG	0	0	1	---	---
<i>Federal Institutional Controls/Engineering Controls Registries</i>						
US ENG CONTROLS	Engineering Controls Sites List	0	0	0	0	---
LUCIS	Land Use Control Information System	0	0	0	0	---
US INST CONTROL	Sites with Institutional Controls	0	0	0	0	---
<i>Federal ERNS List</i>						
ERNS	Emergency Response Notification System	0	0	---	---	---
<i>State and Tribal Equivalent NPL</i>						
RESPONSE	State Response Sites	0	0	0	0	0
<i>State and Tribal Equivalent CERCLIS</i>						
ENVIROSTOR	Envirostor Database	0	0	0	0	2
<i>State and Tribal Landfill and/or Solid Waste Disposal Site List</i>						
SWF/LF	Solid Waste Information System	0	0	0	0	---
<i>State and Tribal Leaking Storage Tank Lists</i>						
LUST	Leaking Underground Storage Tanks	0	0	0	0	---
SLIC	Statewide SLIC Cases	0	0	0	0	---

TABLE III (cont'd)
EDR Radius Map Summary

DATABASE	TYPE OF RECORDS	SUBJECT PROPERTY	<1/8 MILE	1/8 - 1/4 MILE	1/4 - 1/2 MILE	1/2 - 1 MILE
INDIAN LUST	LUST on Indian Land	0	0	0	0	---
State and Tribal Registered Storage Tank Lists						
UST	Active UST Facilities	0	1	0	---	---
AST	Aboveground Storage Tank Facilities	0	0	0	---	---
INDIAN UST	USTS on Indian Land	0	0	0	---	---
FEMA UST	Underground Storage Tank Listing	0	0	0	---	---
State and Tribal Voluntary Cleanup Sites						
INDIAN VCP	Voluntary Cleanup on Indian Land	0	0	0	0	---
VCP	Voluntary Cleanup Program Properties	0	0	0	0	---
ADDITIONAL ENVIRONMENTAL RECORDS						
Local Brownfield Lists						
US BROWNFIELDS	Brownfield Sites	0	0	0	0	---
Local Lists of Landfill/Solid Waste Disposal Sites						
ODI	Open Dump Inventory	0	0	0	0	---
DEBRIS REGION 9	Illegal Dump Site Locations	0	0	0	0	---
WMUDS/SWAT	Waste Management Unit Database	0	0	0	0	---
SWRCY	Recycler Database	0	0	1	0	---
HAULERS	Registered Waste Tire Haulers Lists	0	---	---	---	---
INDIAN ODI	Report on Open Dumps on Indian Land	0	0	0	0	---
IHS OPEN DUMPS	Open Dumps on Indian Land	0	0	0	0	---
Local Lists of Hazardous Waste/Contaminated Sites						
US CDL	Clandestine Drug Labs	0	---	---	---	---
HIST Cal-Sites	Cal sites Database	0	0	0	0	0
SCH	School Property Evaluation Program	0	0	0	---	---
Toxic Pits	Toxic Pits Cleanup Act Sites	0	0	0	0	0
CDL	Clandestine Drug Labs	0	---	---	---	---
US HIST CDL	Detailed National Clandestine Laboratory Registered	0	---	---	---	---
Local Lists of Registered Storage Tanks						
CA FID UST	Facility Inventory Database	0	0	0	---	---
HIST UST	Historical UST	0	0	0	---	---
SWEEPS UST	SWEEPS UST Lists	0	0	0	---	---
Local Land Records						
LIENS 2	CERCLA Lien Information	0	---	---	---	---
LIENS	Environmental Liens Listing	0	---	---	---	---
DEED	Deed Restriction Listing	0	0	0	0	0
Records of Emergency Release Reports						
HMIRS	Hazardous Materials Information System	0	---	---	---	---
CHMIRS	CA Hazardous Material Information System	0	---	---	---	---
LDS	Land Disposal Sites Listing	0	---	---	---	---
MCS	Military Cleanup Sites Listing	0	---	---	---	---
SPIILLS 90	Spills 90 data from First Search	0	---	---	---	---
Other Ascertainable Records						
RCRA Non-Gen	Non-Generators	0	0	0	---	---
DOT OPS	Incident and Accident Data	0	---	---	---	---
DOD	Department of Defense Sites	0	0	0	0	0
FUDS	Formerly Used Defense Sites	0	0	0	0	0
CONSENT	Superfund Consent Decrees	0	0	0	0	0
ROD	Records of Decision	0	0	0	0	0
UMTRA	Uranium Mill Tailings Sites	0	0	0	0	---
MINES	Mines Master Index File	0	0	0	---	---
TRIS	Toxic Chemical Release Inventory System	0	---	---	---	---
TSCA	Toxic Substances Control Act	0	---	---	---	---
FTTS	FIFRA/TSCA Tracking System	0	---	---	---	---
HIST FTTS	FIFRA/TSCA Tracking System	0	---	---	---	---
SSTS	Section 7 Tracking Systems	0	---	---	---	---

TABLE III (cont'd)
EDR Radius Map Summary

DATABASE	TYPE OF RECORDS	SUBJECT PROPERTY	<1/8 MILE	1/8 - 1/4 MILE	1/4 - 1/2 MILE	1/2 - 1 MILE
ICIS	Integrated Compliance Information System	0	---	---	---	---
PADS	PCB Activity Database System	0	---	---	---	---
MLTS	Material Licensing Tracking System	0	---	---	---	---
RADINFO	Radiation Information Database	0	---	---	---	---
FINDS	Facility Index System	X	0	1	---	---
RAATS	RCRA Administrative Action Tracking	0	---	---	---	---
CA BOND EXP. PLAN	Bond Expenditure Plan	0	0	0	0	0
WDS	Waste Discharge System	0	---	---	---	---
Cortese	Cortese Hazardous Waste & Substance Sites	0	0	0	0	---
NPDES	National Pollutant Discharge Elimination System	0	---	---	---	---
HIST CORTESE	Historical Cortese sites.	0	0	0	0	---
CUPA Listings	CUPA Resources List	0	0	0	---	---
Notify 65	Proposition 65 Records	0	0	0	0	0
DRYCLEANERS	Cleaner Facilities	0	0	0	---	---
WIP	Well Investigation Program Case List	0	0	0	---	---
HAZNET	Facility and Manifest Data	0	0	1	---	---
EMI	Emissions Inventory Data	0	---	---	---	---
INDIAN RESERV	Indian Reservations	0	0	0	0	0
SCRD DRYCLEANER	State Coalition for Remediation of Cleaners	0	0	0	0	---
FINANCIAL ASSURANCE	Financial Assurance	0	---	---	---	---
HWP	Envirostor Permitted Facilities Listing	0	0	0	0	0
HWT	Registered Hazardous Waste Transporter	0	0	0	---	---
COAL ASH EPA	Coal Combustion Residues Surface List	0	0	0	0	---
PCB TRANSFORMER	PCB Transformer	0	---	---	---	---
COAL ASH DOE	Steam-Electric Plan Operation Data	0	---	---	---	---
MWMP	Medical Waste Management Program	0	0	0	---	---
US FIN ASSUR	Financial Assurance information	0	0	---	---	---
EPA WATCH LIST	EPA WATCH LIST	0	0	---	---	---
2020 COR ACTION	2020 Corrective Action Program List	0	0	0	---	---
RMP	Risk Management Plans	0	0	---	---	---
PRP	Potentially Responsible Parties	0	0	---	---	---
FUSRAP	Formally utilized sites Remedial Action Program	0	0	0	0	0
LEAD SMELTERS	Lead Smelter Sites	0	0	---	---	---
US AIRS	Aerometric Information Retrieval System Facility Subsystem	0	0	---	---	---
US MINES	Mines Master Index Files	0	0	0	---	---
DOCKET HWC	Hazardous Wastes Compliance Docket Listing	0	0	---	---	---
UXO	Unexploded Ordnances Sites	0	0	0	0	0
ENF	Enforcement Action Listing	0	0	---	---	---
ICE	ICE	0	0	---	---	---
PEST LIC	Pesticide Regulation Licenses Listing	0	0	---	---	---
UIC	UIC Listing	0	0	---	---	---
ABANDONED MINES	Abandoned Mines	0	0	---	---	---
PROC	Certified Processors Database	0	0	0	0	---
PEST LIC	Pesticide Regulation Licenses Listing	0	---	---	---	---
PROC	Certified Processors Database	0	0	0	0	---
WASTEWATER PITS	Oil Wastewater Pits Listing	0	0	0	0	---
ECHO	Enforcement & Compliance History Information	0	0	1	---	---
FUELS PROGRAM	EPA Fuels Program Registered Listings	0	0	0	---	---
EDR HIGH RISK HISTORICAL RECORDS						

TABLE III (cont'd)
EDR Radius Map Summary

DATABASE	TYPE OF RECORDS	SUBJECT PROPERTY	<1/8 MILE	1/8 - 1/4 MILE	1/4 - 1/2 MILE	1/2 - 1 MILE
EDR Exclusive Records						
EDR MGP	Manufactured Gas Plants	0	0	0	0	0
EDR Historical Auto Stations	EDR Historical Auto Stations	0	1	---	---	---
EDR Historical Cleaners	EDR Historical Cleaners	0	---	---	---	---
EDR RECOVERED GOVERNMENT ARCHIVES						
Exclusive recovered Government Archives						
RGA LF	Recovered Government Archive Solid Waste Facilities List	0	---	---	---	---
RGA LUST	Recovered Government Archive Leaking Underground Storage Tank	0	---	---	---	---

0 = No sites in radius identified

--- = Not Searched

The subject property address of 26930 Fir Avenue was listed in the EDR-provided government database on the FINDS database for being occupied by two commercial cellphone towers. No NOV's regarding hazardous material/hazardous waste storage and handling practices were identified. Additionally, the subject property was not listed on any government databases of known or reported releases of hazardous materials or petroleum products to the subsurface. Therefore, the listing of the subject property on the FINDS database does not present an REC to the subject property.

No sites with a reported release of hazardous substances or petroleum products to the subsurface were reported within a one-mile radius of the subject property.

In general, only potentially hazardous materials released from facilities located approximately up-gradient and within a few hundred feet of the site, or in a cross-gradient direction close to the site, are judged to have a reasonable potential of migrating to the site. This opinion is based on the assumption that materials generally do not migrate large distances laterally within the soil, but rather tend to migrate with groundwater in the general direction of groundwater flow.

Two orphan sites were identified in the EDR-provided government database report. Based upon SALEM's visual observations made during our site reconnaissance, as well as various influencing factors including approximate distance from the subject property, the orphan sites are deemed to have a low potential to environmentally impact the subject property.

No Indian reservations or LUSTs on Indian land were reported on the subject property, adjacent sites or vicinity properties in the EDR-provided government database report.

The remaining properties identified by EDR within the specified search radius of the subject property, which appeared on local, state, or federally published lists of sites that use of have had releases of hazardous materials, were determined through SALEM's field observations to be of sufficient distance and/or situated hydraulically cross/downgradient of the subject property, such that impacts to the subject property are not likely.

9.0 POTENTIAL VAPOR ENCROACHMENT CONDITION

Vapor intrusion is a way by which chemicals in soil and groundwater can migrate into indoor air. Chemical vapors moving up through soil and into a building are a potential source of indoor air contamination and may pose a risk to human health. In evaluating the potential for a vapor encroachment condition (VEC) on the subject property, SALEM attempted to determine if there was information indicating that chemicals of concern were located within the “critical distance”, defined as the lineal distance between the nearest edge of a contaminated plume and the nearest target property boundary. Based on ASTM E 2600-15 *Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions*, the “critical distance” is equal to 100 feet, with the exception of dissolved petroleum hydrocarbons, which have a “critical distance” of 30 feet. If non-aqueous phase petroleum hydrocarbons are present, the 100-foot “critical distance” is utilized.

9.1 Vapor Encroachment Screening

SALEM has performed a Vapor Encroachment Screening (Tier 1) in general accordance with the scope and limitations of ASTM Standard Practice E2600-15 for the subject property. Vapor intrusion is a way by which chemicals in soil and groundwater can migrate into indoor air. Chemical vapors moving up through soil and into a building are a potential source of indoor air contamination and may pose a risk to human health. In evaluating the potential for a vapor encroachment condition (VEC) on the subject property, SALEM attempted to determine if there was information indicating that chemicals of concern were located within the “critical distance”, defined as the lineal distance between the nearest edge of a contaminated plume and the nearest target property boundary. Based on ASTM E 2600-15 *Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions*, the “critical distance” is equal to 100 feet, with the exception of dissolved petroleum hydrocarbons, which have a “critical distance” of 30 feet. If non-aqueous phase petroleum hydrocarbons are present, the 100-foot “critical distance” is utilized.

TABLE IV
Vapor Encroachment Questionnaire

QUESTION	RESPONSE	COMMENTS
1. Property Type?	Single-Family Residential	
2. Are there buildings/structures on the subject property?	Yes	
3. Will buildings/structures be constructed on the subject property in the future?	Yes	
4. If buildings exist or are proposed, do/will they have elevators?	No	
5. Type of level below grade (existing or proposed)?	Slab-on-Grade (proposed)	
6. Is there ventilation below grade?	No	
7. Sump pumps, floor drains, or trenches (existing or proposed)?	No	
8. Radon or methane mitigation system installed?	N/A	
9. Heating system type (existing or proposed)?	HVAC (proposed)	
10. Type of fuel energy (existing or proposed)?	Electric	
11. Have there ever been any environmental problems at the subject property?	No	
12. Does/will a gas station operate anywhere on the subject property?	Yes	Proposed Shell gas station
13. Do any tenants use hazardous chemicals in relatively large quantities on the subject property?	No	
14. Have any tenants ever complained about odors in the building or experience health-related problems that may have been associated with the building?	No	
15. Are the operations (or proposed operations to be performed) on the subject property OSHA regulated?	No	

TABLE IV (cont'd)
Vapor Encroachment Questionnaire

QUESTION	RESPONSE	COMMENTS
16. Are there any existing or proposed under-ground storage tanks (USTs) or above-ground storage tanks (ASTs) located on the subject property?	Yes	Proposed Shell gas station
17. Are there any sensitive receptors (children, elderly, people in poor health, etc.) that occupy or will occupy the subject property?	No	

TABLE V
Additional VEC Criteria

QUESTION	RESPONSE	COMMENTS
1. Is the subject property known to have current or past contamination?	No	
2. Is contamination of the subject property suspected?	No	
3. Is an <u>adjacent</u> property known to have current or past contamination which may have impacted the subject property?	No	
4. Is a <u>nearby</u> property known to have current or past contamination which may have impacted the subject property?	No	
5. Is regional groundwater contamination known to exist beneath the subject property?	No	
6. Are you aware of other conditions which may result in vapor intrusion at the subject property?	No	

Based upon the results of SALEM's Tier 1 VES, it is SALEM's opinion that a potential VEC "likely does not exist" at the subject property. As such, no further assessment is recommended.

10.0 BUSINESS ENVIRONMENTAL RISKS

10.1 Asbestos-Containing Building Materials

Asbestos is the name given to a number of naturally occurring, fibrous silicate minerals mined for their useful properties such as thermal insulation, chemical and thermal stability, and high tensile strength. Asbestos is commonly used as an acoustic insulator, thermal insulation, fire proofing and in other building materials. Friable asbestos-containing material (ACM), when dry, can be crumbled, pulverized, or reduced to powder by hand pressure. Non-friable ACM can be crumbled, pulverized, or reduced to powder during machining, cutting, drilling, or other abrasive procedures. Friable ACM is more likely to release fibers when disturbed or damaged than non-friable ACM. Exposure to airborne friable asbestos may result in a potential health risk because persons breathing the air may breathe in asbestos fibers. Continued exposure can increase the amount of fibers that remain in the lung. Fibers embedded in lung tissue over time may cause serious lung diseases including: asbestosis, lung cancer, or mesothelioma. The Occupational Safety and Health Administration (OSHA) regulation 29 CFR 1926.1101 requires certain construction materials to be *presumed* to contain asbestos, for purposes of this regulation. All thermal system insulation (TSI), surfacing material, and asphalt/vinyl flooring that are present in a building constructed prior to 1981 and have not been appropriately tested are "presumed asbestos-containing material" (PACM).

The building located on the subject property was constructed in the early 1980s. It is unknown if the subject building contains ACMs. An asbestos survey of the subject building was not included within the scope of this assessment. Prior to conducting any repair, renovation, or demolition work, SALEM recommends conducting an asbestos survey.

10.2 Lead-Based Paint

Lead is a highly toxic metal that affects virtually every system of the body. While adults can suffer from excessive lead exposures, the groups most at risk are fetuses, infants and children under 6. The Consumer Product Safety Commission banned the use of lead in paint in 1978. Most manufactures, however, had ceased using lead well before this time. Paint applied after 1978 is not considered suspect LBP. Congress passed the Residential Lead-Based Paint Hazard Reduction Act of 1992, also known as “Title X,” to protect families from exposure to lead from paint, dust, and soil. Section 1018 of this law directed the Housing and Urban Development (HUD) and the US EPA to require the disclosure of known information on lead-based paint (LBP) and LBP hazards before the sale or lease of most housing built before 1978. Sellers, landlords, and their agents are responsible for providing this information to the buyer or renter before sale or lease.

According to Section 1017 of Title X, “LBP hazard is any condition that causes exposure to lead from lead-contaminated dust; bare, lead-contaminated soil; or LBP that is deteriorated or intact LBP present on accessible surfaces, friction surfaces, or impact surfaces that would result in adverse human health effects.” Therefore, under Title X intact lead-based paint on most walls and ceilings is not considered a “hazard,” although the condition of the paint should be monitored and maintained to ensure that it does not become deteriorated. LBP is defined as any paint, varnish, stain, or other applied coating that has 1.0 mg/cm² (or 5,000 µg/g by weight) or more of lead.

During SALEM’s site reconnaissance, a visual observation of the painted surfaces within the subject building was conducted. The paint appeared in good condition with no evidence of significant peeling or damage. Because the existing improvements were constructed after 1978, LBP is not suspected to be present. However, it is unknown if the on-site building contains LBP. A LBP survey was not included within the scope of this assessment.

10.3 Radon

Radon is a naturally occurring gaseous substance resulting from the radioactive decay of uranium to radium and then to radon. Uranium is a common element found in many geologic formations and substrates, particularly igneous and metamorphic rocks. Radon has a half-life of only 3.8 days and decays to its daughter elements (polonium 218, polonium 214, bismuth 214, and lead 214). It is these daughter elements that represent the health hazard commonly associated with radon. Radon gas can enter a building through cracks in the foundation and walls and become attached to dust particles and inhaled which could cause damage to human lung tissue. Radon is measured in picocuries per liter of air (pCi/L). The EPA has an established safe radon level of 4 pCi/L. Based on the EPA Radon Zone Map of California, the subject Property is located within **EPA Zone 2**, which has a predicted indoor radon screening less than 4 pCi/L (Low Potential). The EDR-provided radon data cites Riverside County has having 100% of 1st floor spaces, 2nd floor spaces, and basement with <4 pCi/L. There is a low potential for radon above the screening levels at the subject property.

10.4 Mold

Molds are microscopic organisms found virtually everywhere, indoors and outdoors. Mold will grow and multiply under the right conditions, needing only sufficient moisture (e.g. in the form of very high humidity, condensation, or water from a leaking pipe, etc.) and organic material (e.g., ceiling tile, drywall, paper, or natural fiber carpet padding). Mold growths often appear as discoloration, staining, or fuzzy growth on building materials or furnishings and are varied colors of white, gray, brown, black, yellow, and green. In large quantities, molds can cause allergic symptoms when inhaled or through the toxins the molds emit.

SALEM observed accessible, interior areas of the subject property building for significant evidence of mold growth. However, this ESA should not be used as a mold survey or inspection. Additionally, this evaluation was not designed to assess all areas of potential mold growth that may be affected by mold growth on the

subject property. Rather, it is intended to give the client an indication as to whether or not conspicuous (based on observed areas) mold growth is present at the subject property. This evaluation did not include a review of pipe chases, mechanical systems, or areas behind enclosed walls and ceilings.

No visual evidence of mold or water intrusion that could affect human health or that could create or exacerbate a mold problem were observed in accessible areas of the subject building observed during SALEM's site reconnaissance.

11.0 DISCUSSION OF FINDINGS

Historical Uses

The subject property comprises three contiguous irregular-shaped parcels totaling approximately 5.7 acres (Riverside County APNs 487-250-010-9 and 487-250-007 and DD#9241-0A-01) located on the northwest corner of the intersection of Nason Street and Fir Avenue in Moreno Valley, California. SALEM's review of historical aerial photographs indicate that from 1938 to at least 1953, the northern and western portions of the subject property were utilized for agricultural purposes while the southern and eastern portions were undeveloped vacant land. By 1967, the northeastern portion of the subject property was developed with a paved two-lane road and the remainder of the subject property was undeveloped. By 1985 the southwestern portion of the subject property was developed with the current single-family dwelling. Two commercial cell phone towers were developed on the western portion of the subject property in the early 2000's. By 2014, the eastern portion of the subject property was partially graded land developed as the current stormwater basin and the paved two-lane road was no longer present. Based on SALEM's site reconnaissance, and contacts with local regulatory agencies, the potential for RECs to exist in connection with the historical use of the subject property appears to be low.

Current Uses

At the time of SALEM's May 23, 2018 site reconnaissance, the western portion of the subject property was developed with a single-family dwelling and two commercial cell phone towers. The address associated with the residence is 26930 Fir Avenue. The residence was of wood-framed construction on a concrete slab-on-grade foundation and a pitched clay tile roof. The residence was occupied at the time of the site reconnaissance. Additionally, multiple stables were observed on the western portion of the subject property for horses that were formerly boarded on the subject property. The eastern portion of the subject property was partially graded land covered in native vegetation and developed with a stormwater basin.

The northwestern portion of the subject property was developed with two commercial cell phone towers and associated electrical utilities. A backup generator with a 52-gallon diesel sub-tank associated with the northern-most cell phone tower was observed. The diesel sub-tank appeared in good condition and no signs of staining or discoloration were observed. Hazardous materials observed to be stored and handled on the western portion of the subject property included minor quantities of oils, paints, cleaning chemicals and lubricants. Several metal containers of propane were observed in a shed area. No staining in the vicinity of the storage areas was observed. No floor drains were observed in the vicinity of the storage areas.

A septic tank was identified to the north of the residential structure on the western portion of the subject property. No signs of staining or discoloration were observed around the septic tank vicinity. The presence of a septic system is not anticipated to adversely impact the subject property due to its use for domestic purposes only. If redevelopment of the subject property is to occur, the septic system should be properly abandoned/closed or destroyed in accordance with State and local guidelines.

During the visual observations of the subject property, no large quantities of hazardous materials were observed to be stored or handled on the subject property. Exposed surface soils did not exhibit obvious signs of discoloration. No other obvious evidence (vent pipes, fill pipes, dispensers, etc.) of USTs was noted within the area observed. No standing water or major depressions were observed on the subject property.

Based on observations made during SALEM's site reconnaissance, there is no evidence of RECs in connection with the current use of the subject property.

Adjacent Properties

Based on SALEM's field observations, review of the EDR Radius Map Report and consultation with local regulatory agencies, the potential for RECs to exist in connection with the subject property from adjacent property uses appears to be low.

11.1 Evaluation of Data Gaps/Data Failure

In accordance with ASTM E1527-13 guidance, data gaps represent a lack of or inability to obtain information required by this practice despite good faith efforts by the environmental professional to gather such information. Data gaps may result from incompleteness in any of the activities required by this practice. Data failure represents the failure to achieve the historical research objects of this practice even after reviewing the standard historical sources that are reasonably ascertainable and likely to be useful. Data failure is one type of data gap. The following is a summary of data gaps encountered in the process of preparing this report including an observation as the presumed significance of that data gap to the conclusions of this assessment.

- Some of the intervals between documented sources exceeded five years.

However, taken in consideration with the available information obtained in the course of preparing this report in conjunction with professional experience, there is no evidence to suggest that these data gaps might alter the conclusions of this assessment.

12.0 SUMMARY AND CONCLUSIONS

We have performed a *Phase I Environmental Site Assessment* in conformance with the scope and limitations of ASTM Practice E1527-13 of the proposed Shell Gas Station and Retail site located on the northwest corner of Nason Street and Fir Avenue in Moreno Valley, California, the *property*. Any exceptions to, or deletions from, this practice are described in Section 13 of this *report*. During the course of this assessment, SALEM identified no evidence of a REC in connection with the subject property as defined by ASTM E1527-13. However, the following site development issue was identified:

- A septic system associated with the residence was identified on the subject property during SALEM's May 23, 2018 site reconnaissance. The presence of a septic system is not anticipated to adversely impact the subject property due to its use for domestic purposes only. If redevelopment of the subject property is to occur, the septic system should be properly abandoned/closed or destroyed in accordance with State and local guidelines.

13.0 LIMITATIONS

This Phase I ESA Report has been prepared for the exclusive use of **Fuel Xpress, Inc.** and its subsidiaries and affiliates. Unauthorized use of or reliance on the information contained in this report, unless given express written consent by SALEM, **Fuel Xpress, Inc.** is strictly prohibited. The following limitations and exceptions apply:

- The scope of work completed was designed solely to meet the needs of SALEM's client. SALEM shall not be liable for any unintended usage of this report by another party. In addition, based on the ASTM guidelines, the ESA is only valid if completed within 180 days of an acquisition or the transaction necessitating the ESA.
- No ESA can wholly eliminate uncertainty regarding the potential for RECs in connection with a property. This ESA was designed to reduce, but not eliminate the potential for RECs at the subject property, within reasonable limits of time and cost. The ESA is not intended to be exhaustive or all-inclusive and does not represent a guarantee of the identification of all possible environmental risk.
- Information in this report is based on personal interviews, government records, published resources, and various historical documents. Accuracy and completeness of information varies among information sources and may be inaccurate or incomplete. The information utilized in this ESA is from sources deemed to be reliable; however, no representation or warranty is made as to the accuracy thereof. SALEM will have no ongoing obligation to obtain and include information that was not reasonably ascertainable, practically reviewable or provided to SALEM in a reasonable timeframe to formulate an opinion and complete the assessment by the agreed upon due date.
- The ESA includes some information that may be relevant to regulatory compliance, but is not intended and shall not be construed as a compliance audit and cannot be considered a verification of regulatory compliance. While the general environmental setting of the subject property is described, this assessment is not intended to be a formal flood plain or wetland determination, and no warranty is made thereof. Depending on its past, present or future intended use, the property under review may or may not be subject to regulation and permitting under environmental and health and safety laws, such as, but not limited to, the Clean Air Act, the Clean Water Act, the Solid Waste Disposal Act, the Occupational Safety and Health Act, and other federal, state and local regulations. SALEM assumes no responsibility or liability respecting regulatory permitting or compliance issues.
- Client is advised that if the ESA is obtained with the intent of qualifying the purchaser as an innocent landowner, contiguous property owner, or bona fide prospective purchaser under CERCLA, there will be continuing obligations of due care and responsiveness and additional legal requirements that likely apply to such status. SALEM accepts and undertakes no responsibility as to such requirements and advises that counsel be separately consulted with respect to such requirements.
- The findings and conclusions presented in this Phase I ESA Report are based on field review and observations and on data obtained from the sources listed in the report. The findings of this report are valid as of the present. The passage of time, natural processes or human intervention on the subject property or adjacent properties and changes in the regulations can cause changed conditions which can invalidate the findings and conclusions presented in this report.

14.0 QUALIFICATIONS

This Phase I ESA was conducted under the supervision or responsible charge of SALEM's undersigned environmental professional with oversight from the undersigned registered engineer. The work was conducted in accordance with ASTM E1527-13, generally accepted industry standards for environmental due diligence in place at the time of the preparation of this report, and SALEM's quality-control policies.

We declare that, to the best of our professional knowledge and belief, we meet the definition of environmental professional as defined in §312.10 of 40 CFR 312 and we have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. We have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

15.0 REFERENCES

The following list summarizes the references utilized in preparing this report:

- Aerial photographs provided by Environmental Data Resources, Inc.
- California Environmental Protection Agency, Recorded Deed Restriction List, 1994.
- California Environmental Protection Agency, Department of Toxic Substances Control records.
- California Regional Water Quality Control Board records.
- Cal-EPA Voluntary Cleanup Program records.
- California Statewide Radon Survey Screening results conducting during 1990-1991.
- City of Moreno Valley Building and Safety Division records.
- Eastern Municipal Valley Water District records.
- Federal and State regulatory agency lists compiled by EDR.
- Riverside County Assessor's Office records.
- Riverside County Environmental Health Department
- Riverside County Fire Department.
- Sanborn Fire Insurance Maps for San Jacinto, California (EDR).
- The Munger Map Book, California – Alaska Oil & Gas Fields, Munger Maps – 1999.
- U.S. EPA Federal Superfund Liens List and the U.S. EPA California Liens, 1995.
- U.S. Geological Survey, 7.5 minute Sunnymead, California topographic quadrangle map, dated 2012.

If you have any questions, or if we may be of further assistance, please do not hesitate to contact our office at (909) 980-6455.

Respectfully submitted,



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Environmental Project Manager



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2c: herewith

